

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING,
LLC, et al.,

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES
INSURANCE CO., et al.,

Defendants.

CIVIL ACTION

NO. 05-6020 (PBT)

JURY TRIAL DEMANDED

**DECLARATION OF DENNIS J. VALENZA
IN SUPPORT OF PLAINTIFFS' RESPONSE IN OPPOSITION
TO LIBERTY INTERNATIONAL UNDERWRITERS'
MOTION FOR SUMMARY JUDGMENT**

DENNIS J. VALENZA hereby declares as follows:

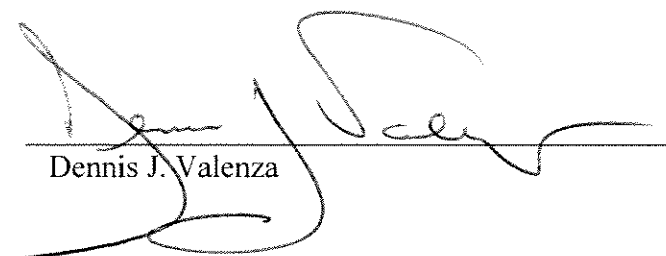
1. I am of counsel with Morgan, Lewis & Bockius LLP, which represents Plaintiffs Blackwater Security Consulting LLC and Blackwater Lodge & Training Center, Inc. in the above-captioned action. I am licensed to practice in the courts of the Commonwealth of Pennsylvania, and I am admitted to practice before the United States District Court for the Eastern District of Pennsylvania.
2. Attached hereto as Exhibit A is a true and correct copy of complaint captioned Nordan v. Blackwater Security Consulting LLC, et al., Case No. 05 CVS 000173, originally filed in the Superior Court of North Carolina, Wake County ("Nordan Litigation").
3. Attached hereto as Exhibit B is a true and correct copy of the Commercial Umbrella Liability Policy No. LG1-B71-200233-014 issued by Liberty International Underwriters ("Liberty") to Blackwater Lodge and Training Center, Inc. ("Blackwater") for the policy period January 27, 2004 to January 23, 2005.

4. Attached hereto as Exhibit C is a true and correct copy of Blackwater's January 6, 2005 letter in which it provided notice of the Nordan Litigation to its broker.

5. Attached hereto as Exhibit D is a true and correct copy of Liberty's response letter dated August 31, 2005.

6. I certify under penalty of perjury that the foregoing is true and correct.

Executed on August 9, 2007.



Dennis J. Valenza